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FCC Mail Room

EX PARTE SUBMISSION

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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Re: Applications for Assignment and Transfer of Control
of Comcast Corporation and Time Warner Cable Inc.
MB Docket No. 14-57

Dear Sir:

On behalf of the SAMA, we are taking this opportunity to communicate our concerns over the proposed merger of Comcast Corporation and Time Warner Cable Inc. that the Federal Communications Commission is currently considering. We are a non-profit organization whose mission is to support small businesses in the City of Hartford by providing technical assistance, loans and trainings to Hartford, Willimantic, New Haven, New Britain and Meriden.

We are concerned that the proposed merger will not be in the best interest of our community as a whole and the Latino community in particular. Both Comcast and TWC are major cable operators in this country and together serve 19 of the top 20 markets in which there are significant Latino populations. Instead of remaining competitors, with the benefits that arise from competition, these two companies seek to merge and become even bigger and stronger, with 30% of all homes being their subscribers.

We believe that reducing competition in the cable television industry does not serve the public interest. On the contrary, it provides the combined company with every reason not to serve the public and the minority groups that are significant numbers of their customers.

One particular concern we have is the programming that will be provided to us if the merger is approved. Given the power Comcast-TWC will hold as the gatekeeper for pay television programming, they will have every incentive to limit the quantity and quality of the programming that is offered. In the Latino-programming marketplace, there is a pressing need for new and varied programming attuned to the needs of younger Latinos, women Latinos, and Latinos who are not Spanish-dominant in their language skills.

We cannot expect that a dominant party, and especially one that already owns Spanish-language programmers Telemundo and mun2, will have any incentive to seek out and incentivize new and innovative programmers to create Latino-market programming. If anything, the merged entity will have every economic incentive to limit new programmers as they do not offer any direct economic benefits to Comcast-TWC.

SPANISH AMERICAN MERCHANTS ASSOCIATION

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The FCC is charged with the duty to serve the consumers of the media and not the owners of the entities that deliver programming. As with any good or service, competition serves to motivate the providers and the absence of competition removes every incentive to innovate and offer more and better service.

After taking into consideration the arguments for and against this merger, we believe that the proposed merger is designed only to provide Comcast with an even greater role than it presently has in the media world. There is absolutely no reason to allow growth for growth's sake. Rather, there is every reason to preserve competition, especially in the media.

Consequently, we urge the FCC to deny the proposed merger and require Comcast and TWC to remain competitors that each seek to provide the best residential video service they can offer.

Sincerely,

A handwritten signature in cursive script, reading "Angel L. Sierra". The signature is written in dark ink and is positioned below the word "Sincerely,".